

# **Plaintiffs' Exhibit 82**

## Message

**From:** Alex Propes [alexpropes@google.com]  
**Sent:** 10/26/2022 2:12:41 PM  
**To:** Dan Taylor [dantaylor@google.com]  
**CC:** Michael Receno [receno@google.com]; Ari Levenfeld [alevenfeld@google.com]; Elijah Lawal [elijahl@google.com]; Ghita Harris-Newton [ghitahn@google.com]  
**Subject:** Re: Google Participation at upcoming NAI Event

Thanks for this very helpful feedback, Dan.

I just connected with Leigh about ensuring this isn't billed/perceived as a TTD vs. Google session, and she agreed that is not the intention and that she'll ensure that the moderated questions avoid that concern. She said she will also check to see if she can confirm that no press will be in the room during this panel:

*"We will definitely not draft any questions or outline that would create a Google vs. TTD narrative. I was hoping to focus instead on high level practical advice for agencies and brands to use when buying ad campaigns, which would give you the opportunity to talk about your privacy enhancements for consumers and your privacy preserving tools for advertising.*

*TTD would, of course, speak to their product and their efforts to address privacy concerns with addressability solutions.*

*And Tony would speak to the upcoming privacy technical standards the tech lab is building, like the GPP, and how brands and agencies can utilize privacy enhancing technologies when making buying decisions.*

*So hopefully that helps - I can also check to see if we can close the event to press except for the location data panel."*

On Wed, Oct 26, 2022 at 10:06 AM Dan Taylor <dantaylor@google.com> wrote:

I'm OK with this; the area of friction will be on Unified ID vs. our stance against cross-site identifiers.

So talking points should be tight with regard to

\* PAIR vs. UID. --> See our TPs on this [here](#).

\* Shree from DV3 has been talking to IAB about potentially making the PAIR technology a technical standard. Not sure how that's progressing but if Tony's on the panel we should be ready for that line of discussion.

\* The market intelligence that TTD is telling clients "We are testing UID 2.0 with Google," which isn't confirmed by anyone on Google to my knowledge. I expect they are likely benefiting from publishers using the Secure Signals feature in this way. I had to answer this question of P&G recently and here are the TPs I used for that:

*Google is not actively testing Unified ID in Google Ads, YouTube or any of our buying and measurement tools, nor do we have plans to do so. We've been clear we don't plan to build alternate identifiers to track individuals as they browse across the web, nor will we use them in our products. We are actively investing in new privacy preserving technologies, including aggregated and on-device solutions and of course the Privacy Sandbox initiative. The Trade Desk is an authorized buyer on Google Ad Manager and may be working with publishers utilizing features to better enable their first party data. But to reiterate, there is no specific engagement between TTD and Google on UID, as we feel cross-site identifiers are not durable long term solutions given the changing privacy and regulatory landscape.*

@Michael Receno as FYI

On Wed, Oct 26, 2022 at 9:49 AM Alex Propes <[alexpropes@google.com](mailto:alexpropes@google.com)> wrote:  
+Dan Taylor +Elijah Lawal for visibility and to weigh in with any thoughts or concerns about our participation here.

Hi Ari,

Confirming this is a similar format to the sessions NAI hosted last year. But NAI has now informed me that there is some chance press will be in the room for the session after all (i.e. they added a location data panel during the event that will be moderated by Wendy Davis).

On Mon, Oct 24, 2022 at 4:16 PM Ari Levenfeld <[alevenfeld@google.com](mailto:alevenfeld@google.com)> wrote:  
Alex, are these forums similar to the ones the NAI did last fall (1 in NY and 1 in SF)? If so, we want to participate. Shying away from participating in events like these is not helping our cause. Given the audience, you're a natural choice. Can you also please loop in the xfn team managing these types of external events related to sandbox, to get their two cents? Barb Smith is the right person to start with there.

On Mon, Oct 24, 2022 at 3:57 PM Alex Propes <[alexpropes@google.com](mailto:alexpropes@google.com)> wrote:  
+Ari Levenfeld for perspective as well.

----- Forwarded message -----

From: **Alex Propes** <[alexpropes@google.com](mailto:alexpropes@google.com)>  
Date: Mon, Oct 24, 2022 at 1:25 PM  
Subject: Google Participation at upcoming NAI Event  
To: Ghita Harris-Newton <[ghitahn@google.com](mailto:ghitahn@google.com)>

Hi Ghita,

**TL;DR:** I wanted to flag that the NAI Privacy Meetup panel I'm confirmed to speak at has evolved since it was first pitched to us (e.g. TTD is now participating). I still think it is good for Google to join the session and I'm comfortable representing us, but I want to first get your thoughts on the revised session and panelists, and whether we/I should participate.

**BACKGROUND:**

On November 3, NAI is hosting a Privacy Meetup as part of Brand Safety Week. I was invited to join a panel discussion entitled "Practical advice for managing targeted campaigns through tumultuous changes in advertising & privacy technology."

NAI has subsequently shared the other confirmed panelists: **Tony Katsur (CEO, IAB)**, **Samantha Jacobson (Chief Strategy Officer, TTD)**, and **Jason Chambers (formerly EVP at IPG)**.

The event is closed to the press and they expect around 50-75 attendees from NAI's member companies, mostly with legal/policy/technology titles.

I think it is good for Google to participate to share our privacy narrative. And as you know, I spoke on a similar NAI panel last year with IAB Tech Lab, Xaxis, and The Trade Desk, which went well. For those reasons, I'm happy to represent Google on the panel and to share my proposed talking points in advance for review/feedback.

But given the other panelists, I did want to request feedback about our/my participation.

Thanks,  
Alex



**Alex Propes**

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